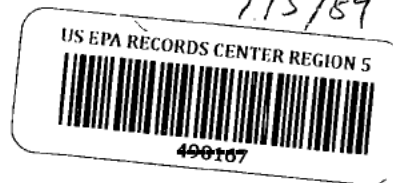


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RICHARD W. FIELDS

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July 5, 1989

VIA FEDERAL EXPRESS

Charles McKinley, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
5CS-TUB-3
230 S. Dearborn
Chicago, Illinois 60603

Re: Amended Response to EPA Request for
Information Pursuant to Section 104(e)
of CERCLA concerning East Jackson Street
Area in Elkhart, IN, dated April 20, 1988

Dear Mr. McKinley:

Enclosed please find an amended response of the Selmer Company ("Selmer") to the above-referenced request for its manufacturing facility located at 500 South Industrial Parkway, Elkhart, Indiana. Selmer has amended its response to questions 7 and 10 of the request.

In its initial response to the request dated June 21, 1988, Selmer stated that an undetermined amount of TCE had been released behind its facility and into a hole in the floor of the facility. After further investigation, Selmer has determined that its response to questions 7 and 10 are inaccurate. The amended response corrects this information by disclosing that a mixture of materials from distillation units connected to TCE degreasing units in the facility may have been released behind the plant and into a hole in the floor beneath a degreasing unit in the facility. This mixture of materials, commonly referred to as still bottoms, consisted of animal fats, rouge, and trace amounts of TCE. Selmer has no information which would support a conclusion that TCE (as opposed to still bottoms) was released at the facility.

Selmer is also amending its response to include the supplemental affidavit of John C. Thibos and the

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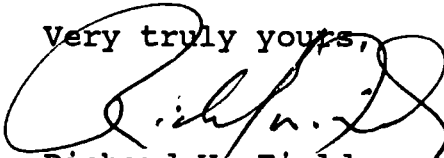
Charles McKinley, Esq.
July 5, 1989
Page 2

affidavit of David A. LeFevre, both of which are dated June 19, 1989, and are enclosed herewith. These are the same affidavits which were provided to you in our meeting in your office on June 27, 1989.

Selmer is also supplementing its response to the request by enclosing herewith the results of analysis of soil and groundwater samples taken at the facility. These results are described in the following documents: Table I, Preliminary Assessment Analytical Results; Table II, OVA Readings; and Phase II Investigation Groundwater Analyses. These documents were also provided to you during our meeting on June 27, 1989.

Please advise me immediately if you have any questions about the enclosures.

Very truly yours,



Richard W. Fields

Enclosures

THE SELMER COMPANY RESPONSE TO
USEPA REQUEST FOR INFORMATION DATED APRIL 20, 1988
FOR FACILITY LOCATED AT
500 INDUSTRIAL PARKWAY, ELKHART, INDIANA

1. The Selmer Company/Vincent Bach Plant
A division of North American Philips
Corporation
500 Industrial Parkway
Elkhart, IN 46516
2. Louie M. Heerwagen, Jr., V.P. c/o The Selmer Company
Manufacturing
Herbert L. Kirts, Chief Engineer "
Richard F. Stackhouse, Manager, "
Health & Safety "
Bruce R. Brenizer, Dir. Employee "
Relations "
David A. LeFevre, Chemist, Retired "
John F. Tunks, Purchasing Agent "
Delbert H. Sharkey, Foreman "
Tom Kish, Production Supervisor "
Allen M. Norris, Materials Manager "
Bill Peak, Plant Manager "
John F. Kelly, Deputy General Counsel
NAPC 100 East 42nd Street, NY, NY 10017
3. Documents
 - a. Fifty-eight (58) invoices from Gold Shield Solvents, dated 1/14/80 thru 10/7/87 for TCE delivered to 500 Industrial Parkway (Bach Plant I). Eight (8) invoices from Safety-Kleen Corp., dated 6/24/85 thru 6/18/87 for TCE delivered to 500 Industrial Parkway (Bach Plant I). Six (6) invoices from Van Waters and Rogers, dated 5/18/87 thru 3/15/88 for TCE delivered to 500 Industrial Parkway.
 - b. Twelve (12) credit memos from Gold Shield Solvents, dated 3/10/80 thru 3/29/86 for reclaimed TCE. Five (5) credit memos from Safety Kleen Corp. dated 3/13/85 thru 3/20/87 for reclaimed TCE.
 - c. Twenty-eight (28) Hazardous Waste manifests for TCE dated 4/24/81 thru 4/21/88.
 - d. SPC 17 Liquid Waste Removal Records dated 2/1/83 thru 2/22/88.
 - e. Copies of Air and Water Permits attached.
Copies of all listed documents are enclosed.

4. None.

5. From July 1970 to present.

6. Yes.

7. a. Tri Chloroethylene

(i) 1965 - 1975. No records.

1976 18,000 gallons (est.)

1977 24,000 gallons (est.)

1978 24,000 gallons (est.)

1979 24,000 gallons (est.)

1980 24,000 gallons (est.)

1981 31,582 gallons

1982 31,239 gallons

1983 32,002 gallons

1984 21,708 gallons

1985 24,613 gallons

1986 21,797 gallons

1987 22,204 gallons

1988 4,386 gallons

(ii) Same as (i) above.

(iii) Vapor degreasing and cold degreasing.

(iv) 1965 - 1976. TCE was processed in distillation units and the only waste material generated by this process was still bottoms consisting of animal fats, rouge and trace amounts of TCE. The records relating to recycling of the still bottoms have been produced to EPA.

(v) The facility opened in 1965. Still bottoms were stored in steel drums, accumulated, and hauled away by Gold Shield Solvents, Detrex and perhaps others for reclamation.

b. T415 Electro Cold Stripper (Methylene Chloride)

(i) 1965-1976. No record.

1976 575 gallons

1977 520 gallons

1978 416 gallons

1979 624 gallons

1980 312 gallons

1981 416 gallons

1982 208 gallons

1983 832 gallons

1984 520 gallons

1985 728 gallons

1986 364 gallons

1987 572 gallons

1988 516 gallons

- (ii) Same as (i) above.
- (iii) Instruments requiring rework are dipped in this solution to remove lacquer prior to refinishing.
- (iv) All.
- (v) As instruments are rinsed after dipping, the stripper solution goes through a treatment system (since 1984) and into city sewer system in accordance with enclosed permit.

8. Bobby Berry, Plant Manager c/o TAC Selmer Company
Bob Britton, Plant Manager "
Sumner Kauffman, Chief Engineer (Retired)

[REDACTED]
All Plant Employees
For additional people see answer to Question 2.

9. All documents listed under Paragraph 3 (attached).

10. a. Tri Chloroethylene

- (i) TCE vapors constantly emitted through degreaser stands and evaporation during normal operation.
- (ii) TCE vapors.
- (iii) Unknown.
- (iv) Degreaser stacks and cold tank vapor and evaporation.
- (v) Lids on vapor degreaser and covers on cold tanks.
- (vi) All employees of Bach Plant.
- (vii) Air permits enclosed.

b. Still bottoms from Trichloroethylene

- (i) Weekly from 1970 to approximately 1974.
- (ii) Mixture of materials from distillation units connected to TCE degreasing units. These "still bottoms" consisted of animal fats, rouge and trace amounts of TCE.
- (iii) Amount undetermined.
- (iv) Release behind plant and into hole in floor near TCE degreasing and distillation units.
- (v) Hole in floor near TCE degreasing and distillation units was sealed 1974/1975.
- (vi) Tom Kish, Del Sharkey and John Thibos (present employees, reachable through Selmer), David LeFevre (consultant reachable through Selmer), Glen Hofstetler, [REDACTED] [REDACTED] [REDACTED]
- (vii) None.

c. Methylene Chloride

- (i) October 12, 1984
- (ii) A lacquer striper containing Methylene Chloride.
- (iii) 3-5 gallons

- (iv) Spilled on lot.
- (v) Soil removal under supervisor of State of Indiana.
- (vi) Herbert Kirts, Plant Engineer
Tom Kish
- (vii) Enclosed

d. T415 Elector Cold Stripper

- (i) 1970-1988 - solution is used nearly every workday.
- (ii) Methylene Chloride
- (iii) Approximately 25 gallons per week based on
estimated purchases of 104 gallons per month.
(Since 1984 has gone through Treatment System.)
- (iv) City sewer rinse water.
- (v) Tank was located in a curb-in area with drain into
city sewer.
- (vi) All employees of Bach Plant I.
- (vii) Copies of city use permits are enclosed.

11. No.

12. N/A.

SUPPLEMENTAL AFFIDAVIT OF JOHN C. THIBOS

I, John C. Thibos, having been duly sworn, depose and declare:

1. This affidavit is made by me upon personal knowledge for the purpose of clarifying and supplementing information contained in the affidavit attached hereto as Exhibit 1 which I executed on April 20, 1989.

2. In paragraph 10 of the affidavit attached hereto as Exhibit 1, I stated that I personally recalled seeing TCE being poured onto the ground in the area behind the brass instrument production facility located at 500 Industrial Parkway in Elkhart, Indiana ("the facility"). In paragraph 9 of that affidavit, I explained that the material disposed of was contained in 55-gallon drums.

3. In connection with my work activities at the facility, I was not involved in filling any of the drums of material referred to in paragraphs 9 and 10 of the affidavit attached hereto as Exhibit 1. Nor did I observe the filling of these drums by any other persons. My conclusion as to the presence of TCE in those drums is based solely upon my knowledge that TCE has been and is used at the facility and upon the fact that I smelled TCE in the area where the drums were located. Since

I cannot be certain as to the exact chemical composition of the materials in the drums, it is possible that the materials contained in the drums consisted of residues from distillation units (referred to as still bottoms) connected to the TCE degreasing units.

4. I declare under penalties of perjury and the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this 19 day of June, 1989.

John C. Thibos
John C. Thibos

Subscribed and sworn to by John C. Thibos before me this 19 day of June, 1989.

Colleen Krecsmar
Notary Public

My Commission expires: 6/25/89

Colleen Krecsmar
Notary Public, State of Indiana
Elkhart County
My Commission Expires 6/25/89

AFFIDAVIT OF DAVID A. LEFEVRE

I, David A. LeFevre, having been duly sworn,
depose and declare:

1. I was employed by C. G. Conn, Ltd. ("Conn") from March 4, 1946 to 1970. From 1951 to 1970, I worked as Chief Chemist-Metallurgist for Conn and was responsible for the operation of the chemical laboratory. From June 1970 until 1979, I was employed by the Selmer Company at the brass instrument production facility located at 500 Industrial Parkway in Elkhart, Indiana ("the facility"). As an employee of the Selmer Company, I was responsible for the supervision of all electroplating operations. Since June 1979, I have visited the facility on many occasions and have consulted with the Selmer Company on various matters.

2. I make this affidavit upon personal knowledge and upon knowledge obtained by me during my employment by Conn and the Selmer Company and during my work as a consultant for the Selmer Company.

3. As Chief Chemist-Metallurgist for Conn, I was responsible for process control of electroplating solutions, alkaline metal cleaning solutions, acid scale and oxide removal solutions, inspection of incoming raw materials for physical properties, and specification writing for new materials. The laboratory was also

involved in the development of new processes and materials. In particular, the laboratory was involved in the improvement of the clear organic coating applied to the buffed brass instruments. In connection with the improvement of the clear organic coating, the laboratory was involved with the development of improved cleaning methods.

4. In approximately 1965, at the time Conn began operating the facility, a catalyzed epoxy coating was undergoing application development by Conn. The cleaning method selected by Conn for this coating was immersion in trichlorethylene ("TCE") assisted by ultrasonic induced surface cavitation. This system involved the use of a degreasing unit connected to a continuously operating distillation unit. The distillation unit was connected to the degreasing unit in order to maintain the cleanest possible immersion medium. This system was installed in the facility at the beginning of operations in 1965.

5. During the operation of the facility by Conn, the performance of the distillation unit with the degreasing unit used in the epoxy coating operation was so favorable that distillation units were eventually connected to all degreasing units in the facility. When the Selmer Company purchased the facility in

1970, all degreasing units in the facility had been connected to distillation units.

6. The function of a distillation unit is to concentrate grease, oil and buffing compounds in the unit and thus provide a cleaner medium for degreasing of parts. Distillation units are continuously operated until boiling temperatures rise about five degrees Farenheit above the boiling point of the solvent which is being recovered. When the temperature in the distillation unit reaches this point, no more solvent is drawn from the degreasing unit and the residual solvent and other materials in the distillation unit are heated until the boiling point is raised another ten degrees Farenheit. Live steam is then introduced into the distillation boiling chamber and the combination of agitation and mixing of steam and solvent vapors removes 90% or more of the remaining solvent. The remaining heated sludge in the bottom of the distillation unit is then drained from the unit into 55-gallon drums.

7. With the use of several distillation units in the facility, it became economically advantageous to return the sludge, or still bottoms, to the solvent vendor for further solvent recovery. The Selmer Company sold these 55-gallon drums of still bottoms to DETREX Chemical and received credit against future purchases

for drums of still bottoms which were returned to the solvent vendor.

8. I declare under penalties of perjury and the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 19 day of June, 1989.

David LeFevre
David LeFevre

Subscribed and sworn to by David LeFevre before me this 19 day of June, 1989.

Colleen Krecsmar
Notary Public

My Commission expires: 6/25/89

Colleen Krecsmar
Notary Public, State of Indiana
Elkhart County
My Commission Expires 6/25/89

TABLE 1
Selmer Band Instruments
Elkhart, Indiana
Preliminary Assessment Analytical Results

<u>SAMPLE LOCATION</u> (EMS Sample No.)	<u>RESULTS*</u>	
Sample 1 (3.0 - 3.5') (122746)	Methylene Chloride Xylenes Trichloroethene	.87 1.2 11.0
Sample 1 (-8') (122747)	Trichloroethene	9.1
Sample 2 (2.5') (122748)	Trichloroethene	.50
Sample 2 (8.0') (122749)	Trichloroethene	1.4
Sample 2 (14.0-14.5') (122750)	Trichloroethene	(0.25)
Sample 3 (6') (122751)	Methylene Chloride Xylenes	.60 .59
Sample 4 (5') (122752)	ND	
Sample 5 (0.5 - 1.5') (122753)	Methylene Chloride 1,2-Dichloroethene	.77 1.1
Sample 5 (7.0 - 8.5') (122754)	ND	
Sample 6 (7.0 - 8.5') (122755)	ND	
Sample 6 (13') (122756)	Methylene Chloride Xylenes	.65 .55
Sample 7 (4') (122757)	Methylene Chloride Trichloroethene Xylenes	.61 4.9 .79

TABLE 1
(Continued)

Sample 7 (9') (122758)	Acetone	1.6
	Methylene Chloride	1.1
	Trichloroethene	.49
	Xylenes	1.2
Sample 7 (10.0-11.5') (122759)	ND	
Sample 8 (11.5 - 13.0') (122760)	Methylene Chloride	.62
	Trichloroethene	1.9
	Xylenes	1.1
Sample 9 (6.5 - 8.0') (122761)	Methylene Chloride	.51
Sample 9 (11.0 - 12.5') (122762)	Methylene Chloride	.77
	Xylenes	.88
Sample 10 (0 - 2') (122763)	Methyl ethyl ketone	1.2
Sample 10 (2 - 4') (122764)	Methyl ethyl ketone	.71
Grab Sample (Shallow ground water) (122765)	1,2-Dichloroethene (total)	490 uG/L
	Trichloroethene	160 uG/L
	Vinyl Chloride	35 uG/L
Decon Water Composite (122774)	Trichloroethene	10.0 uG/L

(.25) = Estimated concentration, below methods detection limits

* All results in mg/kg, unless otherwise indicated.

ND = No compounds detected by RCRA volatiles scan (Method SW846-8240).

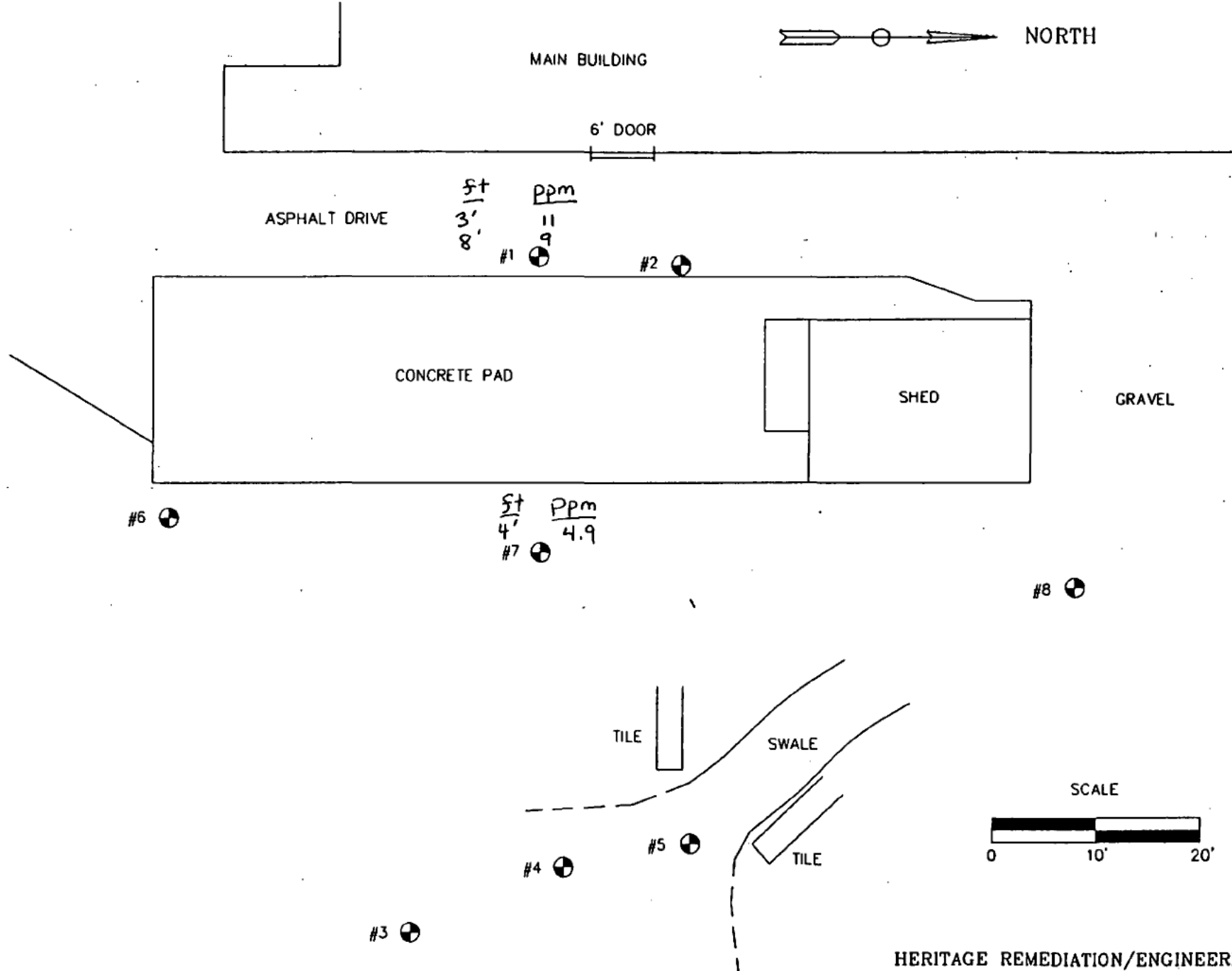
TABLE 2
Selmer Band Instruments
Elkhart, Indiana
OVA Readings

<u>Boring/Sample</u>	<u>Reading* (ppm as CH₃)</u>
#1 (0-5')	6 to 8
#1 (5-10')	4 to 6
#2 (1.0-2.5')	4.8 to 9.4
#2 (2.5-4.0')	4.8
#2 (4.0-5.5')	4.0
#2 (5.5-7.0')	3.8
#2 (7.0-8.5')	4.4
#2 (8.5-10.0')	3.8
#2 (10.0-11.5')	5.0
#2 (11.5-13.0')	5.0
#2 (13.0-14.5')	4.2
#3 (0-2')	4.2
#3 (2-4')	4.2
#3 (4-6')	4.2
#3 (6.0-7.5')	0.0 (HNu)
#3 (7.5-9.0')	0.0 (HNu)
#4 (0-1.5')	0.0 (HNu)
#4 (1.5-3.0')	0.0 (HNu)
#4 (3.0-5.0')	0.0 (HNu)
#4 (5.0-7.0')	0.0 (HNu)
#4 (7.0-9.0')	No reading
#5 (.5-1.5')	No reading, slight odor
#5 (7.0-8.5')	No reading v. slight odor
#6 (1.0-2.5')	4.2
#6 (2.5-4.0')	4.2
#6 (4.0-5.5')	3.5
#6 (5.5-7.0')	4.2
#6 (7.0-8.5')	4.2
#6 (8.5-10.0')	12
#6 (10.0-11.5')	4.2
#6 (11.5-13.0')	4.2
#6 (13.0-14.5')	5.0
#7 (1.0-2.5')	7.0
#7 (2.5-4.0')	18.0

TABLE 2
(Continued)

<u>Boring/Sample</u>	<u>Reading* (ppm as CH₃)</u>
#7 (4.0-5.5')	22.0
#7 (5.5-7.0')	5.6
#7 (7.0-8.5')	12
#7 (8.5-10.0')	34
#7 (10.0-11.5')	40
#7 (11.5-13.0')	.6
#8 (1.0-2.5')	5.0
#8 (2.5-4.0')	4.6
#8 (4.0-5.5')	4.4
#8 (5.5-7.0')	4.4
#8 (7.0-8.5')	No recovery
#8 (8.5-10.0')	4.8
#8 (10.0-11.5')	4.6
#8 (11.5-13.0')	4.6
#9 (5.0-6.5')	4.2
#9 (6.5-8.0')	4.0
#9 (8.0-9.5')	4.0
#9 (9.5-11.0')	4.0
#9 (11.0-12.5')	4.0
#10 (0-2')	4.4
#10 (2-4')	4.6
Grab Sample (open hole)	3.8

*Ambient OVA readings ranged from 3.2-6.0



SAMPLE LOCATION PLAN

⊕ = BORING/SAMPLE LOCATION

TCE concentrations ppm

HERITAGE REMEDIATION/ENGINEERING INC.
 (NORTH AMERICAN PHILLIPS)
 SELMER BAND INSTRUMENTS
 ELKHART, IN
 SCALE: 3/4"=10'
 89058160 JFH5/2/89

INDUSTRIAL PKWY

TCE
TANK

BACKDOOR

LACQUER STORAGE SHED

BORING S-1

POND/SWAMP

14-WS

15-WS

Selmer Band Instruments
Vincent - Boch Inc)